



## BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003  
202-543-5450 phone ■ 202-543-4791 fax  
info@beyondpesticides.org ■ www.beyondpesticides.org

April 11, 2017

Kimberly Smith  
Office of Pesticide Programs FOIA Team Leader  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on TELONE C-15 ( 11220- 20-ZA ) through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for TELONE C-15 ( 11220- 20-ZA ). The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in TELONE C-15 ( 11220- 20-ZA ), not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

Pursuant to amendments to the FOIA which provide for a waiver of fees if it is "in the public interest because furnishing the information can be considered as primarily benefiting the public," I request such a waiver of fees. The material will be used for public information.

Thank you for your attention to this request. Please contact me if you require more information in order to respond to this request.

Sincerely,

Annie D'Amato, Esq.  
Legal and Policy Associate



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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on TRI-FORM 30 ( 11220- 21-AA ) through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for TRI-FORM 30 ( 11220- 21-AA ). The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in TRI-FORM 30 ( 11220- 21-AA ), not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Washington, DC 20460

Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on BROM-O-GAS 2% ( 5785- 42-ZA ) through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for BROM-O-GAS 2% ( 5785- 42-ZA ). The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in BROM-O-GAS 2% ( 5785- 42-ZA ), not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on CHLOROPICRIN ( 5785- 58-AA ) through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for CHLOROPICRIN ( 5785- 58-AA ). The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in CHLOROPICRIN ( 5785- 58-AA ), not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on TRI-CON 33/67 ( 8536- 20-AA- 11220) through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for TRI-CON 33/67 ( 8536- 20-AA- 11220). The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in TRI-CON 33/67 ( 8536- 20-AA- 11220), not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on Evergreen Pyrethrum Concentrate (MGK Co.) mgk-2170 through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for Evergreen Pyrethrum Concentrate (MGK Co.) mgk-2170. The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in Evergreen Pyrethrum Concentrate (MGK Co.) mgk-2170, not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on Keeper Professional (Bio-Cide International, Inc.) box-3346 through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for Keeper Professional (Bio-Cide International, Inc.) box-3346. The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in Keeper Professional (Bio-Cide International, Inc.) box-3346, not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on SaniDate FD (BioSafe Systems) bss-4550 through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for SaniDate FD (BioSafe Systems) bss-4550. The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in SaniDate FD (BioSafe Systems) bss-4550, not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on Celite 610 (Imerys Minerals California, Inc.) cel-6615 through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for Celite 610 (Imerys Minerals California, Inc.) cel-6615. The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in Celite 610 (Imerys Minerals California, Inc.) cel-6615, not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on Natular 2EC (Clarke Mosquito Control Products, Inc.) cmc-1843 through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for Natular 2EC (Clarke Mosquito Control Products, Inc.) cmc-1843. The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in Natular 2EC (Clarke Mosquito Control Products, Inc.) cmc-1843, not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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Dear Ms. Smith,

Beyond Pesticides is a non-profit, public health and environmental organization that provides information to the public about pesticides and least-toxic alternative methods of pest control. We are writing to request information on Natular G Mosquito Larvicide / Granule (Clarke Mosquito Control Products, Inc.) through the Freedom of Information Act (FOIA).

We request a copy of the Confidential Statement of Formula (CSF) (EPA Form 8570-4) submitted to EPA by the registrant for Natular G Mosquito Larvicide / Granule (Clarke Mosquito Control Products, Inc.). The percentage of each ingredient may be redacted. We are of the position that this request does not conflict with 5 U.S.C Section 552 (b)(4), as we only wish to receive information pertaining to the identity of the ingredients in Natular G Mosquito Larvicide / Granule (Clarke Mosquito Control Products, Inc.), not the percentage of each chemical in the product or its formulation. Because of the limited scope of our inquiry, the information requested does not meet the exemption for trade secrets or confidential commercial information. This interpretation of the statute is in line with existing case law where trade secret protection has been denied for general information concerning a pesticide product formula when release would not reveal the actual formula itself. *Northwest Coalition for Alternatives to Pesticides v. Browner*, 941 F. Supp. 197, 201-02 (D.C. 1996).

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